

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

James E. Shelton, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

Pro Source Lending Group LLC, d/b/a Fast
Fund Group, d/b/a Fast Funds Group,

Defendant.

Civil Action No.: 2:24-cv-04394-GAM

**DECLARATION OF THOMAS CIALINO IN SUPPORT OF
DEFENDANT’S MOTION TO DISMISS PLAINTIFF’S COMPLAINT**

I, Thomas Cialino, declare and state as follows:

1. I am a member of the Bars of the Commonwealth of Pennsylvania and the State of New Jersey, and I am an attorney with the law firm Blank Rome LLP.
2. I am over 18 and have personal knowledge of the following information and could competently testify to the same.
3. I serve as counsel to Defendant, Pro Source Lending Group LLC, d/b/a Fast Fund Group, d/b/a Fast Funds Group (“Defendant”) in the above-captioned case.
4. I make this declaration in support of Defendant’s Motion to Dismiss Plaintiff’s Complaint.
5. On September 5, 2024, counsel for Plaintiff, James E. Shelton (“Plaintiff”), sent an email to my colleague, Jeffrey Rosenthal, responding to a question about the complete telephone number that gave rise to Plaintiff’s claims in this matter. Plaintiff’s counsel stated that “Mr. Shelton’s full number on which he received the calls is (484) 626-3942.”

6. Attached collectively hereto as **Exhibit A** are copies of the Complaint and the First Amended Complaint that Plaintiff filed with this Court in the case captioned as *Shelton v. Target Advance LLC* and docketed at Case No. 2:18-cv-02070-NIQA (the “Target Advance Action”).

7. Attached hereto as **Exhibit B** is a copy of the Motion to Dismiss Plaintiffs’ Complaint that the defendant filed in the Target Advance Action.

8. Attached hereto as **Exhibit C** is a copy of the notice that Plaintiff filed with this Court on July 2, 2018, in a prior action that was captioned *Shelton v. Capital Advances LLC, et al.* and docketed at Case No. 2:18-cv-02186. In this notice, Plaintiff supplied a list of 29 cases that he filed where he sought relief under the Telephone Consumer Protection Act.

9. I hereby further declare that all statements made herein are of my own knowledge and are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001.

Executed this 6th day of November 2024 in Philadelphia, Pennsylvania.

/s/Thomas P. Cialino
Thomas P. Cialino